

December 14, 2011

South Coast Air Quality Management District Permit Services 21865 Copley Drive P.O. Box 4944 Diamond Bar, CA 91765-0944

Re: Steelscape Inc. Facility ID 126498 D8 Functional Replacement Application Tracking Number: 529302

Dear Permit Services:

Steelscape submitted this permit application to install a functionally identical coater in the Rancho Cucamonga facility. The current coater is past its end of life expectation. Business conditions have made it critical to pursue a project to invest in an acceptable replacement to the current coater. The conditions include, but are not limited to the following:

- Safety/Environment
 - The current coater has a cracked frame that has been temporarily remedied with a surface weld.
 - Better control of film application associated with new equipment will reduce waste associated with the production process.
- Quality
 - The coater head will intermittently disengage creating less than prime material which is unacceptable to our customers.
- Competitive Environment
 - Steelscape competes with imported material and the project is expected to generate over \$600,000 in annual savings which will enable us to remain competitive in this market.
- Customer Service
 - o Scheduled project completion is critical to customer service, business continuity and profitability. Orders for this line have been postponed for the duration of the project and the open capacity for the line will not be able to be filled due to the order cycle and the line will remain idle. This may negatively impact Steelscape employees and our customer's employees through a loss of earnings during this time.

This new equipment will maintain the same material throughput and use the same materials as the previous permitted equipment; therefore this application presents no emissions increase. Due to the straight forward nature of this permit application, Steelscape anticipates an expedited review by EPA is possible. Steelscape appreciates EPA's understanding regarding the sensitive nature of this expedited review request and looks forward to hearing back from the responsible engineer upon receipt of this permit application package.

Sincerely,

Joe Disilva Plant Manager

Steelscape Inc. 11200 Arrow Route Rancho Cucamonga, CA 91730 909 484-4649

